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January 27, 2004

VIA COURIER AND ELECTRONIC MAIL

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Second Floor
Boston, MA 02110

Re: D.T.E. 03-87 – Report of the Department of Telecommunications and Energy
relative to reducing the number of double utility poles within the Commonwealth,
pursuant to Chapter 46 of the Acts of 2003, Section 110

Dear Secretary Cottrell:

Please find enclosed for filing one (1) original and nine (9) copies of the double pole elimination plan of Massachusetts Electric Company and Nantucket Electric Company (together, the “Company”) in the above-captioned docket. Thank you very much for your time and attention to this matter.

Very truly yours,

Judy Y. Lee

cc: William Stevens, Hearing Officer
Ronald LeComte, Director, Electric Power Division
Michael Isenberg, Director, Telecommunications Division
Joseph Rogers, Esq.

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Massachusetts Electric Company
and
Nantucket Electric Company

Double Pole Backlog
Elimination Plan

Submitted pursuant to the
Report of the Department of
Telecommunications and Energy
relative to reducing the number of
double utility poles within the
Commonwealth, pursuant to
Chapter 46 of the Acts of 2003,
Section 110

January 27, 2004

Submitted to:
Massachusetts Department of
Telecommunications and Energy
Docket D.T.E. No. 03-87

Submitted by:

Massachusetts Electric

A **National Grid** Company



Nantucket Electric

A **National Grid** Company



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I. Introduction

2

II. Mass. Electric Measures to Address Double Pole Backlog

Mass. Electric will institute a double-pronged approach to eliminate its backlog of double poles as soon as reasonably practicable. This approach will address the issues that delay the removal of double poles that are under the direct control of the Company and that require the cooperation of third-party attachers.

Mass. Electric has reconfigured its policies relating to the management of double poles issues to make greater use of private contractors. Currently, Mass. Electric is reviewing bids from contractors for its pole transfers, and the resulting contracts will cover work on the existing backlog of poles ready for transfer as well as the poles that become ready for transfer in the future. Mass. Electric is already using contractors to remove the poles that are ready for removal by the Company. The scope of this pole removal contract covers work on the existing backlog of poles ready for removal, as well as the work on the poles that become ready for removal in the future. Mass. Electric expects that the greater utilization of private contractors will cut the number of poles awaiting transfer or removal by the Company by approximately half within a year. By this time next year, Mass. Electric expects to have approximately 1,250 poles awaiting transfer and approximately 300 poles awaiting removal by the Company. These figures will remain fairly constant going forward.

With respect to third-party attachers (i.e. parties that have entered into licensing agreements with Mass. Electric for the use of space on Mass. Electric's poles), Mass. Electric will work with these attachers to expedite the transfer of their facilities from existing poles to new poles. Mass. Electric will begin the process by sending the attachers a letter explaining: (i) the significance of the Department's Report in D.T.E.

03-87 with respect to the attacher's obligations to transfer its facilities in a timely manner; (ii) the attacher's contractual requirement to transfer its facilities within fifteen (15) days of receiving written notice from Mass. Electric requesting such transfer; (iii) Mass. Electric's contractual right to transfer the attacher's facilities or have the facilities transferred on the 16th day if the attacher fails to transfer its facilities, and Mass. Electric's contractual right to recoup the costs of such transfer; and (iv) the attacher's ability to use PLM to manage and report on its transfers expeditiously. Mass. Electric will use PLM to monitor transfers by these attachers, and if any attachers fail to transfer their facilities in a timely manner, Mass. Electric will begin to transfer such attacher's facilities after the 16th day.

In contrast to Mass. Electric's enforcement rights with respect to third-party attachers as described above, Mass. Electric does not have the right to enforce facilities transfers for municipal attachers that use Mass. Electric's poles to install their fire alarm systems. Mass. Electric does not execute agreements with municipalities for the installation of these fire alarm systems, because municipalities reserve the right to place fire alarm systems on Mass. Electric's poles as a condition of the grant of location for these poles. In this case, Mass. Electric's only option is to emphasize to the municipalities the exhortation in the Department's Report for pole owners and the municipalities to "engage in good faith negotiations to provide for the timely transfer of municipal facilities" (Report, page 17) and for Mass. Electric to communicate to the municipality that the Company's ability to comply with the pole removal statute is contingent upon the municipality's cooperation in transferring its facilities.

The situation is also different for Mass. Electric's joint pole owner. Mass Electric has no contractual rights to perform transfers or pole removals should its joint owner fail to perform this work. The joint owner is, however, also regulated by the Department, and the Department can directly enforce performance standards with respect to the joint owner.

III. Changes in Mass. Electric Policies for New Poles

The Company is also taking steps to ensure that going forward, as existing poles are replaced with new poles, the existing poles are removed within the 90-day period mandated by M.G.L. c. 164, § 34B. Mass. Electric will facilitate this process by endeavoring to complete its facilities transfers and pole removals within 15 days. To this end, Mass. Electric plans to expand the use of contractors in the completion of facilities transfers from existing poles to new poles and in the performance of pole removal work. Mass. Electric will continue to emphasize the need for all pole owners and users to utilize PLM to coordinate and manage their facilities transfer and pole removal activities and the importance of timely and accurate data entry by all parties. Finally, Mass. Electric will increase its use of the cut-and-kick method of pole replacement, which reduces the time required to remove a double pole by eliminating one final trip to the pole to remove the last piece of pole. About one-half of all pole replacements can be performed using the cut-and-kick method.

IV. Conclusion

Mass. Electric is confident that the foregoing measures and policy changes will be effective in reducing its backlog of double poles and will facilitate the prompt removal of any double poles created in the future.